

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, et al.,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	

**ASPEN AMERICAN INSURANCE COMPANY, BERKLEY INSURANCE COMPANY,
EVEREST REINSURANCE COMPANY AND SIRIUS AMERICA INSURANCE
COMPANY’S COLLECTIVE WITNESS AND EXHIBIT LIST FOR JUNE 18, 2021
VIDEO/TELEPHONIC CONFIRMATION HEARING
(Relates to Docket No. 1284)**

Aspen American Insurance Company, Berkley Insurance Company, Everest Reinsurance Company and Sirius America Insurance Company (the “Sureties”), by and through their undersigned counsel, hereby file this witness and exhibit list (the “Witness and Exhibit List”) for the video/telephonic Confirmation Hearing scheduled for June 18, 2021 at 9:30 a.m. (CST) (the “Hearing”):

WITNESSES

The Sureties may call any of the following witnesses at the Hearing:

1. Any witness called or listed by any other party
2. Any witness required for rebuttal
3. Michael Dane, CFO – Fieldwood Energy, LLC / Fact Witness
4. Jon Graham, Sole Manager - FWE I / Fact Witness

¹ The Debtors, each of which have filed a separate voluntary petition, are: Dynamic Offshore Resources NS, LLC; Fieldwood Energy LLC; Fieldwood Energy Inc.; Fieldwood Energy Offshore LLC; Fieldwood Onshore LLC; Fieldwood SD Offshore LLC; Fieldwood Offshore LLC; FW GOM Pipeline, Inc.; GOM Shelf LLC; Bandon Oil and Gas GP, LLC; Bandon Oil and Gas, LP; Fieldwood Energy SP LLC; Galveston Bay Pipeline LLC; and Galveston Bay Processing LLC.

5. Lily Cheung, P.E. – Netherland Sewell & Associates / Expert Witness
6. A representative from Aspen American Insurance Company to authenticate the surety bonds and indemnity agreements, and any other documents/evidence that needs testimonial evidence to support its admissibility / Fact Witness
7. A representative from Berkley Insurance Company to authenticate the surety bonds and indemnity agreements and any other documents/evidence that needs testimonial evidence to support its admissibility / Fact Witness
8. A representative from Everest Reinsurance Company to authenticate the surety bonds and indemnity agreements and any other documents/evidence that needs testimonial evidence to support its admissibility / Fact Witness
9. A representative from Sirius America Insurance Company to authenticate the surety bonds and indemnity agreements and any other documents/evidence that needs testimonial evidence to support its admissibility / Fact Witness

EXHIBITS

The Sureties may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
A	Spreadsheet of the Sureties' surety bonds (demonstrative)				
B	Copies of each of the Sureties' surety bonds				
C	Copies of each of the Sureties' indemnity agreements				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
D	Debtors' Response to Interrogatories and Request for Production of Documents dated May 5, 2021 and served on May 6, 2021				
E	Debtors' Amended Response to Interrogatories and Request for Production of Documents dated May 12, 2021				
F	Mike Dane Deposition Transcript – FILED UNDER SEAL				
G	Jon Graham Deposition Transcript – FILED UNDER SEAL				
H	J.P. Hanson Deposition Transcript – FILED UNDER SEAL				
I	Lily Cheung, P.E. Deposition Transcript – FILED UNDER SEAL				
J	Brett Cupit, Esq. Deposition Transcript – FILED UNDER SEAL				
K	J.P. Hanson Expert Report dated April 21, 2021 – FILED UNDER SEAL				
L	J.P. Hanson Rebuttal Report to BP's Report dated May 24, 2021 – FILED UNDER SEAL				
M	Marc J. Brown, CFA Expert Report dated April 21, 2021 – FILED UNDER SEAL				
N	Lily Cheung, P.E. Expert Report dated May 24, 2021 – FILED UNDER SEAL				
O	Edward M. McDonough Expert Report dated May 10, 2021 – FILED UNDER SEAL				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
P	Geoffrey G. Roberts, P.E. Expert Report dated May 10, 2021 – FILED UNDER SEAL				
Q	FWE-00000008 – FWE I One-lines – FILED UNDER SEAL				
R	FWE-00000016 – FWE I Model – FILED UNDER SEAL				
S	FWE-00000017 – ARIES File				
T	FWE-0038675 – FWE I Model (Updated) – FILED UNDER SEAL				
U	FWE-0045265 – Fields Not Returning to Production / Timing of Fields Returning – FILED UNDER SEAL				
V	FWE-0045403 Total Abandonment with Field Status – FILED UNDER SEAL				
W	FWE-00000008 – FWE I Onelines_YE2020_LWC Comments (Lily Cheung, P.E. Work Notes) – FILED UNDER SEAL				
X	FWE0121 (Lily Cheung, P.E. Work Notes)				
Y	FWE-0038675_FWE00000016 with live links Revised (Lily Cheung, P.E. Work Notes) – FILED UNDER SEAL				
Z	FWE-0045403 Total Abandonment with Field Status_LWC (Lily Cheung, P.E. Work Notes) – FILED UNDER SEAL				
AA	FWE I Summaries 1P Revised (Lily Cheung, P.E. Work Notes) – FILED UNDER SEAL				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
BB	2013 Apache Decommissioning Agreement and All Amendments Thereto				
CC	April 29, 2021 E-mail from Fieldwood to Government Regarding Bonding – FWE-0045280– FILED UNDER SEAL				
DD	May 11, 2021 E-mail from Sureties to Debtors Advising of Debtors’ Obligation to Supplement				
EE	Sale Offers for FWE I Assets – FWE-0047937, FWE-0047938, FWE-0047949 – FILED UNDER SEAL				
FF	FWE-034 (produced to the Sureties on 6/14/21) – FILED UNDER SEAL				
GG	FWE-0049079 (produced to the Sureties on 6/14/21) – FILED UNDER SEAL				
HH	FWE-0049108 (produced to the Sureties on 6/14/21) – FILED UNDER SEAL				
II	FWE-0049109 (produced to the Sureties on 6/14/21) – FILED UNDER SEAL				
JJ	FWE-0049174 (produced to the Sureties on 6/14/21) – FILED UNDER SEAL				
KK	FWE-0049177 (produced to the Sureties on 6/14/21) – FILED UNDER SEAL				
	All documents or data relied upon by Lily Cheung, P.E. in formulating her report, and listed on p. 4 of her report				
	Any exhibit designated by any other party				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				
	Any document produced by any party in discovery				
	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				

The Sureties reserve the right to amend or supplement the Witness and Exhibit List at any time prior to the Hearing.

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Dated: June 16, 2021

HUSCH BLACKWELL LLP

By: /s/ Randall A. Rios

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**ATTORNEYS FOR ASPEN AMERICAN
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REINSURANCE COMPANY AND SIRIUS
AMERICA INSURANCE COMPANY**

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2021, a true and correct copy of the foregoing document was served as provided by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Timothy A. Million

Timothy A. Million